

EXHIBIT 1

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June 29, 2005

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Re: Alice Kieft, v. American Express Company, et al.
C.A. No. 04-10949

Dear Stephen:

Pursuant to our proposed schedule for automatic disclosures, I enclose Defendants' Initial Disclosures Pursuant to Rule 26(A)(1). Please note that the defendants will produce certain documents after we enter into an appropriate confidentiality agreement. If you would like me to forward those documents which are not confidential in the interim, please let me know that.

Very truly yours,



Constance M. McGrane

CMM/gvp:05182-031

Enclosure

cc: James F. Kavanaugh, Jr., Esq.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Docket No. 04-10949-NMG

ALICE KIEFT
Plaintiff

v.

AMERICAN EXPRESS COMPANY,
ET AL.,
Defendants**DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO RULE 26(A)(1)**

The defendants American Express Company ("American Express"), American Express Company Long Term Disability Plan ("LTD Plan"), and American Express Company Life Insurance Plan ("Life Insurance Plan"), pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A), make the following initial disclosures. The LTD Plan and Life Insurance Plans are employee welfare benefit plans governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA").

Plaintiff's claims for benefits due under the LTD Plan and Life Insurance Plan are actions for review on an administrative record. Further, the plaintiff's claims for disability pursuant to the Salary Continuation Benefits policy are also, in essence, an action for review on an administrative record. Accordingly, such claims are exempt from initial disclosure. However, defendants will produce the administrative record as part of its initial disclosure. Finally, the defendants note that certain of the documents contain confidential information, and will seek appropriate safeguards before production.

The following disclosures are based on information reasonably available to the defendants or their attorneys as of the date of these disclosures.

I. Disclosure Pursuant to Fed. R. Civ. P. 26(a)(1)(A)

From the information currently available to defendants, the following individuals are likely to have discoverable information that defendants may use to support their claims and defenses in this matter. The information they have is contained in the claim files which will be produced in this action.

<u>NAME</u>	<u>NATURE OF INFORMATION</u>
Jennifer LoPresti Metropolitan Life Insurance Company, (Disability Resource Specialist)	Salary Continuation Plan decision
Tanzzy Cooley Metropolitan Life Insurance Company, (Case Manager)	Disability under American Express Salary Continuation Plan
Renay Bryant Metropolitan Life Insurance Company (Disability Resource Specialist)	Appeal of Salary Continuation decision
Gary P. Greenhood, M.D.	Independent Physician Consultant Review, 6/10/03
Jefrey D. Lieberman, M.D.	Independent Physician Consultant Review, 6/10/03
Coleen A. Lyons, American Express Company, (Manager, Benefits)	General information about disability claims and policies at American Express Company
Karen DiProfio, RN American Express Company; (Director of Nursing Services)	Appeal at American Express Company
Stuart Kaplan, M.D.	Independent Physician Review, 10/03/03
Steve Raymond, Esq.	Information about Appeal of disability claims by Alice Kieft

II. Disclosure Pursuant to Fed. R. Civ. P. 26(a)(1)(B)

The following is a description by category of documents currently in the possession, custody or control of the defendants, or their attorneys, that they may use to support their defense of this matter.

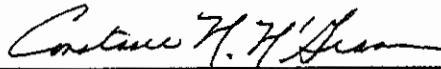
1. Metropolitan Life Insurance Company ("MetLife") documents, including claim file (KIEFT00001-00018; KIEFT00019-00053; KIEFT00145-00265; KIEFT00299-KIEFT00362; KIEFT00420-00548);
2. American Express documents, including claim file (KIEFT/AMEX00001-00201);
3. Correspondence between Alice Kieft or her attorney and MetLife or American Express Company (contained in the above two categories of documents; KIEFT/AMEX00450-00463); and
4. Plan documents for the LTD Plan, Life Insurance Plan and Salary Continuation Plan, as well as the summary plan descriptions (KIEFT/AMEX00202-00274; KIEFT/AMEX00275-00398).

III. Disclosure Pursuant to Fed. R. Civ. P. 26(a)(1)(D)

1. The defendants will produce the Group Benefits Plan Insurance Policy for Long Term Disability Life and AD&D Insurance, with certain exhibits. (See II 4).

2. Administrative Services Agreement between MetLife and American Express for Salary Continuation Benefits. (KIEFT/AMEX 00826 – KIEFT/AMEX 00863).

DEFENDANTS,
By their attorneys,



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DATED: June 29, 2005

228054.1

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon (each party appearing pro se and) the attorney of record for each (other) party by mail (by hand) on 6/29/05

